REMARKS

Reconsideration and allowance of the above-identified application are respectfully requested. Claims 1-15 remain pending, wherein claims 1 and 9-12 have been amended. Specifically, claims 1 and 9-12 have been amended to recite "that each of the plurality of search targets is included in only one of the plurality of division blocks with no overlap of search targets between each of the plurality of division blocks". Support for this amendment can be found in the present application, for example, in Figures 2a-2c and the accompanying disclosure.

Initially, Applicants' would like to thank Examiner Opsasnick for his time and courtesy during the personal interview conducted with the undersigned on March 3, 2005. During the personal interview, the Examiner agreed that Smith does not disclose or suggest "that each of the plurality of search targets is included in only one of the plurality of division blocks with no overlap of search targets between each of the plurality of division blocks" as now recited in Applicants' claims 1 and 9-12.

In the second paragraph of the Office Action, claims 1-15 are rejected under 35 U.S.C. § 103(a) as allegedly being obvious in view of the combination of U.S. Patent No. 6,184,823 to Smith et al. ("Smith") in view of U.S. Patent No. 6,173,279 to Levin et al. ("Levin"). This ground of rejection is respectfully traversed.

The combination of Smith and Levin does not render Applicants' claim 1 unpatentable because the combination does not disclose or suggest all of the

elements of Applicants' claim 1. For example, the combination does not disclose or suggest "that each of the plurality of search targets is included in only one of the plurality of division blocks with no overlap of search targets between each of the plurality of division blocks" as recited in Applicants' claim 1. Additionally, it is respectfully submitted that Smith "teaches away" from a modification which would result in each of the plurality of search targets being included in only one of the plurality of division blocks with no overlap of search targets between each of the plurality of division blocks as recited in Applicants' claim 1.

As discussed above, during the personal interview with the undersigned, the Examiner agreed that Smith does not disclose or suggest "that each of the plurality of search targets is included in only one of the plurality of division blocks with no overlap of search targets between each of the plurality of division blocks." For example, Smith discloses that in the geographic database 40 (illustrated in Figure 5), "[t]here is some overlap of data between each" of the subsets of data. (Col. 9, lines 31-34). Similarly, with regard to the routing data 136, Smith discloses that the routing data 136 is organized into layers, and that "the organization of some of the data into layers results in some duplication of the data." (Figure 6 and col. 11, lines 11-12).

Levin is cited for the disclosure of categorizing the database details according to attribute. However, Levin does not remedy the above-identified deficiencies of Smith with regard to Applicants' claim 1. Because Smith and Levin both do not disclose or suggest "that each of the plurality of search targets is included in only one of the plurality of division blocks with no overlap of search

targets between each of the plurality of division blocks", the combination cannot disclose or suggest such.

As also discussed during the personal interview, Smith "teaches away" from a modification of the disclosure of Smith so "that each of the plurality of search targets is included in only one of the plurality of division blocks with no overlap of search targets between each of the plurality of division blocks." As discussed above, Smith discloses there is an overlap of data between subsets of data in the geographic database 40, and a duplication of data between the layers of the routing data 136.

With regard to the overlap of data in the subsets of data in the geographic database 40, Smith states that this duplication is desirable because "each of the navigation functions benefits from the resultant efficiency of handling smaller amounts of data." Similarly, with regard to the duplication of data between layers of the routing data 136, Smith explicitly states that this duplication results in increased efficiency, which offsets any disadvantages. (Col. 11, lines 12-13). Because Smith teaches that it is desirable to overlap data between different subsets of data and duplicate data across different layers of data, it is respectfully submitted that one skilled in the art would not have been motivated to modify Smith such that "that each of the plurality of search targets is included in only one of the plurality of division blocks with no overlap of search targets between each of the plurality of division blocks," as recited in Applicants' claim 1.

Because the combination of Smith and Levin does not disclose or suggest all of the elements of Applicants' claim 1, and because Smith teaches away from

a modification to include the elements missing from the combined disclosures of Smith and Levin, the combination of Smith and Levin cannot render Applicants' claim 1 unpatentable.

Claims 2-8 variously depend from Applicants' claim 1, and are, therefore, patentably distinguishable over the combination of Smith and Levin for at least those reasons stated above with regard to Applicants' claim 1.

Claims 9-12 recite similar elements to those discussed above with regard to Applicants' claim 1. Accordingly, these claims are patentably distinguishable over the combination of Smith and Levin for similar reasons to those discussed above with regard to claim 1. Claim 13 depends from claim 12, and claims 14 and 15 depend from claim 9. Accordingly, these dependent claims are patentably distinguishable over the combination of Smith and Levin for at least those reasons stated above with regard to their respective independent claim.

For at least those reasons stated above, it is respectfully requested that the rejection of claims 1-15 as allegedly being obvious in view of the combination of Smith and Levin be withdrawn.
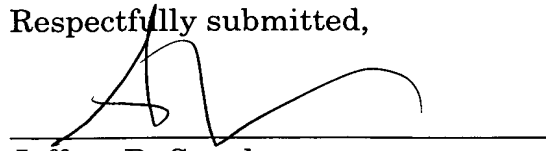
If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

It is respectfully requested that, if necessary to effect a timely response, this paper be considered as a Petition for an Extension of Time sufficient to effect a timely response and shortages in other fees, be charged, or any overpayment in

fees be credited, to the Deposit Account of Crowell & Moring, L.L.P., Account No.

05-1323 (Docket #029267.49237US).

Respectfully submitted,

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